

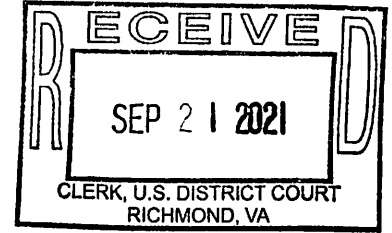
Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

## UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

Richmond Division



Case No.

3:21 cv 610

(to be filled in by the Clerk's Office)

MICHAEL PRINCE HODGES

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

RICHARD B. CAMBELL, JACQUELINE S  
MCCLENNEY, DENNIS F SODEN,  
CHRISTOPHER K PEACE, LISA PIPER attorney  
for GABRIELLE CAMILLE  
SHACKLEFORD/CEVALLOS

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☒ Yes ☐ No

## COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	MICHAEL PRINCE HODGES sui juris		
Address	C/O 5327 CHAMBERLAYNE ROAD SUITE 15043		
	RICHMOND	VIRGINIA	[23227]
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number	3476143743		
E-Mail Address	drayze2@gmail.com		

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name	GABRIELLE CAMILLE SHACKLEFORD/ CEVALLOS		
Job or Title <i>(if known)</i>	ex girlfriend		
Address	1814 5 ave		
	richmond	virginia	23222
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number	unknown		
E-Mail Address <i>(if known)</i>			
<input checked="" type="checkbox"/> Individual capacity <input type="checkbox"/> Official capacity			

**Defendant No. 2**

Name	LISA PIPER		
Job or Title <i>(if known)</i>	N/A Individual		
Address	3711 westerre parkway		
	henrico	virginia	23233
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	henrico		
Telephone Number	unknown		
E-Mail Address <i>(if known)</i>	unknown		

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

☒ Individual capacity ☐ Official capacity

## Defendant No. 3

Name RICHARD B CAMPBELL

Job or Title (if known) N/A Individual

Address 1600 OliverHill way suite c181

Richmond

Virginia

23219

City

State

Zip Code

County

Telephone Number 804-646-2942

E-Mail Address (if known)

☒ Individual capacity ☐ Official capacity

## Defendant No. 4

Name JACQUELINE S MCCLENNEY

Job or Title (if known) N/A Individual

Address 400 North 9th street

Richmond

Virginia

23219

City

State

Zip Code

County

Telephone Number 804-646-6431

E-Mail Address (if known)

☒ Individual capacity ☐ Official capacity**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

You honor my name is Michael Prince Hodges I'm Sur Juris and I'm seeking remedy and relief from the injury that the courts have caused with false written orders against me directly affecting my ability to care and nurture my children. (MULTIPLE COMMONWEALTH OF VIRGINIA COURT ORDERS On several occasions according to the court order for visitation set in place I have been denied said ordered visitation by my ex-girlfriend along with Commonwealth of Virginia judges and Virginia Licensed lawyers of the Commonwealth in casefixing without cause and conspiring against me denying me judicial remedy and depriving me of my rights to life, liberty in the pursuit of happiness enjoying the rights the raising my off spirmg playing my part as a father in my sons KHAIDEN SHACKLEFORD and KAI SHACKLEFORD.

I am requesting that my case be heard in federal court from Henrico family court since I've been deprived of my rights 18 241 and 18 242 including to commit conspiracy against me just to elevate the case when no crime has been committed. Miss GABRIELLE CAMILLE SHACKLEFORD/CEVALLOS my ex has routinely denied visitation with a standing visitation order in place. My ex partner continues her false and egregious fabrications and continues take steps to bring fraud into the court with false accusations and hearsay fabricating delusions of "the world according to Gabriel." Her insidious fabrications to law enforcement officials including the sheriff have served her well and directly in opposition of my childrens best interest. Most recently (DATE OF WRIT AND RECORD NUMBER) in a writ filed, she gained the courts favor and obtained a protective order to put a stop to my visitation of my sons and impose malicious prosecution with hearsay evidence without any proof or evidence.

On her meeting with the sheriff's (DATE AND TIME OFF THE REPORT/CONTACT)office Miss GABRIELLE CAMILLE SHACKLEFORD obtained an order from the sheriff 03/09/2021 in the city of Richmond when she has a pending case against her that got started before which was initiated by me on 12/18/2020 for failure to surrender my offspring for visitation.

On 03/26/2021 we had a court hearing in another county which I was unable to attend due to I had visitation with my other son and they do not allow children into the court which I left a letter with the courthouse which they ignored it and ruled in her favor rather than scheduling the hearing for another date. After all of the showcause's that I have filed against her she has used a false allegation to obtain a protective order to evade justice. She knew I was not able to attend that day of the hearing. And the court ruled in her favor with just heresay and no evidence, no police report, no investigation and no injured party.

Upon the last attempt to go and pick up my sons for visitation on march 15,2021 after I called the police to get my police report to ring to court calling for assistance the police arrived and Miss Shackleford and miss Gleason her mother informed the police of the protective order.

The family court and the civil court failed the rules of civil procedure . I brought this matter to the John Marshall courthouse only to be denied again proper civil rules and procedure. JACQUELINE S MCCLENNEY without regard her oath of office and failure to provide due process and equal protection by denying my right of constitutionally due process, for my remedy since the Judge JACQUELINE S MCLENNEY did not follow proper procedure and the opposing party did not present scientific evidence nor empirical data evidence, i.e. Police reports just only allegations and heresay in the court.

I ask that this court vacate this unjust protective order against that name MICHAEL PRINCE HODGES since it's an attempt to assassinate my character in an attempt to take revenge to impose malicious prosecution due to her feelings of taking revenge. I also demand restorative restitution of my parental rights and the Commonwealth of Virginia is admonished for allowing this parental injury to occur.

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- C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

You honor my name is Michael Prince Hodges I'm Sur Juris and I'm seeking remedy and relief from the injury that the courts have caused with false written orders against me. On several occasions according to the court order for visitation set in place I have been denied said ordered visitation by my ex-girlfriend along with Commonwealth of Virginia judges and Virginia Licensed lawyers of the Commonwealth in casefixing without cause and conspiring against me denying me judicial remedy and depriving me of my rights to life, liberty in the pursuit of happiness enjoying the rights the raising my offspring playing my part as a father in my sons KHAIDEN SHACKLEFORD and KAI SHACKLEFORD.

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The family court and the civil court failed the rules of civil procedure. I brought this matter to the John Marshall courthouse only to be denied again proper civil rules and procedure. JACQUELINE S MCCLENNEY without regard her oath of office and failure to provide due process and equal protection by denying my right of constitutionally due process, for my remedy since the Judge JACQUELINE S MCCLENNEY did not follow proper procedure and the opposing party did not present scientific evidence nor empirical data evidence, i.e. Police reports just only allegations and heresay in the court.

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I ask that this court set aside a hearing for 50/50 custody arrangements since I am have been denied proper arrangements from the Henrico Family court, Oliver Hill Juvenile court, John Marshall court

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.



You honor my name is Michael Prince Hodges I'm Sur Juris and I'm seeking remedy and relief from the injury that the courts have caused with false written orders against me. On several occasions according to the court order for visitation set in place I have been denied said ordered visitation by my ex-girlfriend along with Commonwealth of Virginia judges and Virginia Licensed lawyers of the Commonwealth in casefixing without cause and conspiring against me denying me judicial remedy and depriving me of my rights to life, liberty in the pursuit of happiness enjoying the rights the raising my off spirmg playing my part as a father in my sons KHAIDEN SHACKLEFORD and KAI SHACKLEFORD.

I am requesting that my case be heard in federal court from Henrico family court since I've been deprived of my rights 18 241 and 18 242 including to commit conspiracy 42 USC 1985 against me just to elevate the case when no crime has been committed. Miss GABRIELLE CAMILLE SHACKLEFORD my ex has routinely denied visitation with a standing visitation order in place. My ex partner continues her false and egregious fabrications and continues take steps to bring fraud into the court with false accusations and hearsay fabricating delusions of "the world according to GABRIELLE." Her insidious fabrications to law enforcement officials including the sheriff have served her well and directly in opposition of my childrens best interest. Most recently in a writ filed, she gained the courts favor and obtained a protective order to put a stop to my visitation of my sons and impose malicious prosecution with hearsay evidence without any proof or evidence.

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Upon the last attempt to go and pick up my sons for visitation on march 15,2021 after I called the police to get my police report to ring to court calling for assistance the police arrived and Miss SHACKLEFORD and miss GLEASONn her mother informed the police of the protective order.

The family court and the civil court failed the rules of civil procedure Failed to have an actual injured party or police report. I brought this matter to the John Marshall courthouse only to be denied again proper civil rules failed to provide evidence of an injured party and procedure. JACQUELINE S MCCLENNEY without regard her oath of office and failure to provide due process and equal protection by dening my right of constitutionally due process, for my remedy since the Judge JACQUELINE S MCCLENNEY did not follow proper procedure and the opposing party did not present scientific evidence nor empirical data evidence, i.e. Police reports just only allegations and heresay in the court.

I ask that this court vacate this unjust protective order against that name MICHAEL PRINCE HODGES since it's an attempt to assassinate my character in an attempt to take revenge to impose malicious prosecution due to her feelings of taking revenge. I also demand restorative restitution of my parental rights and the Commonwealth of Virginia is admonished for allowing this parental injury to occur.

I ask that this court set aside a hearing for 50/50 custody arrangements since I am have been denied



**III. Statement of Claim**

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

**A. Where did the events giving rise to your claim(s) occur?**

1. Oliver hill family court was the first event with RICHARD B CAMPBELL giving the other against me when I explained to him clearly I am unable to attend that court date because I had my son with noone to watch him he filed it against me anyway on just hearsay no police evidence no police reports no medical reports thats deprivation of rights not unequal protection of the law with GABRIELLE CAMILLE SHACKLEFORDS heresay allegations. All of these events started up after I began to filed my police reports of the proof of the showcauses of my ex girlfriend decided to withhold my offspring from me after she found out I moved on with someone else pursuing a relationship. In other words Miss SHACKLEFORD is trying to make every attempt to evade justice I filed my police report on 12/18/2020 and placed that document along with other police reports totaling of the denial of visitation and filed showcauses only to be denied.

2.The second event I went to go to John Marshall to appeal that decision JACQUELINE S MCCLENNEY ruled against me anyway with only heresay and no proof no police evidence no police reports no medical reports thats also deprivation of rights and unequal protection of the law against GABRIELLE CAMILLE SHACKLEFORD false allegations along with lisa piper her attorney. The judge JACQUELINE S MCCLENNEY after being given the 9 police reports totalling she still denied my request to reverse the decision of the lower court oliver hill family court. Then she still proceeded to allow the court to grant the order of protection without any evidence,medical reports or police reports or even an investigation only on the basis of heresay evidence.

3.The third event was on was recent and we have a pending case to a different jurisdiction the court automatically took her side along with heresay allegations coming from GABRIELLE CAMILLE SHACKLEFORD the gaurdian ad litem CHRISTOPHER K PEACE who is promoting the controversy of GABRIELLE CAMILLE SHACKLEFORDS allegations based on heresay which are false because she does not have any proof of evidence with times or dates or police reports along with the judge DENNIS F SODEN deprivation of rights,conspiracy without any proof of the events of which Miss SHACKLEFORD is describing and could not give exact dates of those events.

**B. What date and approximate time did the events giving rise to your claim(s) occur?**

03/26/2021 RICHARD B CAMPBELL placed his protective order against me based SOLEY off heresay (EMPHISIS ADDED).

I went to appeal the decision of RICHARD B CAMPBELL to have the order vacated and the case dismissed since there was no evidence so the case went to John Marshall court.

07/08/2021 Date where JACQUELINE S MCCLENNEY placed her protective order against me based SOLEY off of heresay.Only to have the ADMINISTRATIVE ADJUCATIVE magistrate JACQUELINE S MCCLENNEY still grant the order of protection against me on 07/29/2021 with bias against me as a man without any proof and granted the order against me just with only her insidious claim based on heresay; no emperical evidence, no witness statement, no assult investigation with scientific evidence, i.e. Rape Kit has ever been submitted.

C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

Your honor my Ex girlfriend GABRIELLE CAMILLE SHACKLEFORD/CEVALLOS has really has a serious case of revenge in a retaliatory effort to try and destroy my reputation since I have moved on with my new girlfriend. She has made every effort to bring false claim into the court alleging me of child abuse, false allegations of sexual assault without any proof, or police reports or an investigation from law-enforcement whatsoever just so that she can use that as a crutch to assassinate my character as a means of separation since we have a case pending which I filed several showcauses against her for not allowing me to see my sons KHAIDEN SHACKLEFORD and KAI SHACKLEFORD but the judges are ignoring the fact that I have not seen my sons since december of last year.

On 03/23 2021 RICHARD B CAMPBELL took on a case where I was unable to attend since I had my offspring with me and no court case cannot be heard at that moment so I left a letter with the magistrate that I have visitation with my offspring it was still ignored the court granted the protective order without an injury, or police report or investigation towards Miss GABRIELLE SHACKLEFORDS frivolous filing on heresay. 18 USC 241 deprivation of rights, 18 USC 242 Conspiracy against rights and , 42 USC 1985 section 2 denied equal protection of the laws. I was not given any consideration since I has a civil order of visitation of my last son with that particular court not related to her that I have some someone else.

In conjunction she has hired a lawyer LISA PIPER who has her lawfirm make every effort to lie and also bring in false hearsay accusations without any evidence that does not hold any claim and they have still went through with their attack. JACQUELINE S MCCLENNEY a judge or magistrate has taken steps to ignore the police reports I have filed against GABRIELLE SHACKLEFORD CEVALLOS for not allowing my visitation which is court ordered and she has ignored and still proceeded to award the order of protecton without any evidence clearly deprivation of rights 18 USC 242, Conspiracy against rights 18 USC 241, and 42 USC 1985 section 2 conspiracy to interfere with civil rights by also denying equal protection of the laws she granted the protective order without any proof or evidence or even a police report or investigation on just heresay on what GABRIELLE CAMILLE SHACKLEFORD said. I asked the judge or magistrate how is it a matter of an injured party if GABRIELLE CAMILLE SHACKLEFORD has only heresay to provide to this court. JAQCULINE S MCCLENNEY ignored it and granted the protective order with only heresay assumptions and presumptions with no proof of evidence whatsoever.

#### IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

My injuries are complex and involve financial duress, emotional pain with the inability to see my sons due to filed hearsay, misleading statements to record, and fabricated claims authored and designed to admonish me and blocking my access to my flesh and blood living equity, my sons. The property of the trust in which I control has been taken from me due to GABRIELLE CAMILLE SHACKLEFORDS false heresay accusations and parties involved, LISA PIPER GABRIELLE CAMILLE SHACKLEFORDS lawyer LISA PIPER, RICHARD B CAMPBELL, JACQUILINE S MCCLENNEY, CHRISTOPHER K PEACE the GAL, DENNIS F SODEN.

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**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

For my relief I wish for no monetary damages and due to miss GABRIELLE SHACKLEFORDS false frivolous filings based off on her feelings. I ask that this court grant me Michael Prince Hodges sui Juris 50/50 percent of my sons permanently and that all my property that was taken from me belonging to the trust that siezed by Henrico police be returned immediately or reumburse me for that property taken from me since I am the one administrating the item which has been claimed by the trust. If I have to endure these damages each party has been given my fee schedule for damages

Christopher K Peace

Time in court \$75,000.00

Color of law trespass \$150,000.00

fraud upon the court \$2,000,000.00

obstruction of justice \$1,000,000.00

Vexatious litigation \$5,000,000.00

Silence dishonor default \$50,000.00

Dishonor in Commerce \$10,000,000.00

Total:\$18,275,000.00

Lisa Piper

Time in court \$75,000,00

Color of law Tresspass \$150,000.00

Fraud upon the court \$2,000,000.00

obstruction of justice \$1,000,000.00

Vexation litigation \$5,000,000.00

Silence dishonor default \$50,000.00

Dishonor in commerce \$10,000,000.00

Jacqueline S McClenney

Time in court \$75,000,00

Color of law Tresspass \$150,000.00

Fraud upon the court \$2,000,000.00

obstruction of justice \$1,000,000.00

Vexation litigation \$5,000,000.00

Silence dishonor default \$50,000.00

Dishonor in commerce \$10,000,000.00

Dennis F Soden

Time in court \$75,000,00

Color of law Tresspass \$150,000.00

Fraud upon the court \$2,000,000.00

obstruction of justice \$1,000,000.00

Vexation litigation \$5,000,000.00

Silence dishonor default \$50,000.00

Dishonor in commerce \$10,000,000.00

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: \_\_\_\_\_

Signature of Plaintiff \_\_\_\_\_

Printed Name of Plaintiff \_\_\_\_\_

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Address \_\_\_\_\_

\_\_\_\_\_  
*City*

\_\_\_\_\_  
*State*

\_\_\_\_\_  
*Zip Code*

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_